

**REMARKS**

In the outstanding Office Action, claims 1-15 were rejected. Claims 1, 6 and 11 have been amended for clarification, and new claim 16 has been added. Thus, claims 1-16 are pending and under consideration. No new matter has been added. The rejections are traversed below.

**OBJECTION TO DRAWINGS:**

On page 2 of the Office Action, the Examiner objected to FIG. 33 for lack of description of the same in the specification.

FIG. 33 is described on page 37, line 25 through page 38, line 13 of the specification. The paragraph starting at page 37, line 25 through page 38, line 13 has been amended to clarify that the same relates to FIG. 33.

Accordingly, withdrawal of the rejection is respectfully requested.

**OBJECTION TO THE SPECIFICATION:**

At item 2 of the Office Action, the Abstract of the present application was objected to for failing to comply with the requirement of MPEP §608.01(b).

The Abstract is amended to comply with MPEP §608.01(b).

**REJECTION UNDER 35 U.S.C. §102(b):**

In the outstanding Office Action, claims 1-15 were rejected under 35 U.S.C. §102(b) as being anticipated by the Adobe Photoshop® 5.0 User Guide (Adobe Photoshop®).

Adobe Photoshop® discusses selecting a path or a path segment having continuous anchor points where selecting the path or path segment displays all of the anchor points on the selected portion.

The present invention discloses a method and device for selecting a figure having a plurality of elements where an association or relationship is defined between the elements such that designation of one element triggers automatic selection of another element(s) based on the association defined.

The Examiner compares the path selection method of Adobe Photoshop® where points constituting the path are selected with the present invention. Adobe Photoshop® discusses a direct-selection tool for selecting a path having points or a segment of the path and displaying all anchor points on the selected portion of the path including any direction lines and direction

points if the selected segment is curved (see, page 157, column 1 paragraph 3 of Adobe Photoshop®). The selection method is limited to selecting a subpath directly under the pointer, and selection of an entire path or subpath and selection of additional paths/segments requires an additional operation, such as holding down the Alt key (see, page 157, column 2 of Adobe Photoshop®). Further, the Adobe Photoshop® method is directed to selecting points of a figure having their ends previously connected to form a path (see, page 157, column 1 of Adobe Photoshop®). This means that the Adobe Photoshop® method requires individual manual selection when additional paths/segments need to be selected.

As recited in amended independent claims 1, 6 and 11, the designation of one element of the plurality of figure elements enables “retrieving another figure element which is connected with or/and is regarded to be connected with the designated figure element”. The present invention eliminates the need for individually selecting of elements of a figure, and the selection method is not restricted to figures having connected sequential and uniform elements. This is unlike the Adobe Photoshop® method where individual selection of elements is required for non-continuous points constituting the path. Accordingly, the Adobe Photoshop® method does not teach or suggest a selection method for selecting elements of a figure where the designation of one elements allows, “retrieving another figure element which is connected with and/or is regarded to be connected with the designated figure element”.

It is submitted that the independent claims are patentable over Adobe Photoshop®.

For at least the above-mentioned reasons, claims depending from independent claims 1, 6 and 11 are patentably distinguishable over Adobe Photoshop®. For example, as recited in claims 3, 8 and 13, the retrieval operation of the present application includes automatically retrieving additional “figure elements adjacent to the retrieved figure element” that are associated with the designated figure element. The Adobe Photoshop® method does not teach or suggest retrieving figure elements “connected with and/or [is] regarded to be connected with the designated figure element”.

The selection method and device of the present application enables retrieval of other elements of a figure upon designation of one element and is not anticipated by Adobe Photoshop® method limited to selection of continuous points of a path or a path segment.

Therefore, withdrawal of the rejection is respectfully requested.

**NEW CLAIM:**

New claim 16 is added to emphasize that the selection method of the present application

includes "defining relationships of the elements of the figure" and "automatically retrieving elements of the figure upon selection of one of the elements in the relationship". This eliminates the need to manually select each element of a figure, and allows the present invention to automatically retrieve elements of a figure.

Accordingly, newly added claim 16 is patentably distinguishable from the cited reference.

**CONCLUSION:**

In accordance with the foregoing, claims 1, 6 11 have been amended for clarification, and claim 16 has been added. Thus, claims 1-16 are pending and under consideration.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 6/28/04

By: J. Randall Beckers  
J. Randall Beckers  
Registration No. 30,358

1201 New York Avenue, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501

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P.O. Box 1450, Alexandria, VA 22313-1450  
on 6/28, 2004

STAAS & HALSEY  
By: Tennant A. Fawcett  
Date: 6/28/04